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July 24, 2000

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Magalie R. Salas
Secretary, Federal Communications Commission
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Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

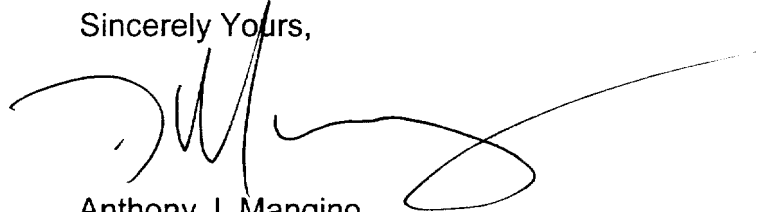
99-2001

Dear Ms. Salas,

Enclosed for filing please find an original and four copies of the Comments in Partial Support of the ILEC Petitions for Stay and Reconsideration of the Ad Hoc Telecommunications Users Committee.

If you have any questions regarding this filing, please contact me at (202) 857-2558.

Sincerely Yours,



Anthony J. Mangino
Legal Assistant

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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 OFFICE OF THE SECRETARY

_____)
 In the Matter of _____)
 _____)
 Numbering Resource Optimization _____)
 _____)
 _____)

CC Docket No. 99-200

**Comments of the Ad Hoc Telecommunications Users Committee in Partial
 Support of the ILEC Petitions for Stay and Reconsideration**

I. Introduction

A number of incumbent local exchange carriers ("ILECs") have filed petitions¹ requesting that the Commission stay and reconsider certain aspects of the First Report and Order in the above-captioned proceeding pending reconsideration.² The Ad Hoc Telecommunications Users Committee ("the Committee" or "Ad Hoc") hereby submits its comments in partial support of these Petitions. In particular, Ad Hoc supports the suspension pending reconsideration of Section 52.15(f)(1)(vi) of the Commission's Rules,³ which limits the amount of time a customer can reserve a number to forty-five days. Because this rule will substantially interfere with the telecommunications planning needs of many

¹ See Verizon Petition for Suspension of Enforcement Date and Reconsideration (filed July 17, 2000); BellSouth Corporation Emergency Petition for Partial Stay (filed July 10, 2000); Petition for Clarification and/or Reconsideration of the United States Telecom Association ("USTA") (filed July 17, 2000); Petition for Immediate Partial Stay of USTA (filed July 17, 2000); Petition for Reconsideration and Clarification of SBC Communications, Inc. (filed July 17, 2000); Emergency Petition for Partial Stay of SBC Communications, Inc., ALTS, and NEXTLINK Communications Inc. (filed July 7, 2000) (collectively, "Petitions").

² *Numbering Resource Optimization*, 15 FCC Rcd 7574 (2000) ("Order").

³ 47 C.F.R. § 52.15(f)(1)(vi).

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businesses while doing relatively little to alleviate number exhaust, the rule should be suspended, and, upon reconsideration, the Commission should extend the reserved interval to the eighteen months suggested by the North American Numbering Council (“NANC”).

II. A Forty-Five Day Limit on Holding Numbers in Reserve Is Inconsistent With the Needs of Many Businesses, and Will Do Little to Alleviate Number Exhaust

In its *Order*, the Commission determined that the period of time during which specific customers could hold “reserved numbers”⁴ was limited to forty-five days.⁵ In choosing this forty-five day limit, the Commission rejected NANC’s recommendation to allow numbers to remain in reserved status for up to eighteen months.⁶ Rather, the Commission chose forty-five days because this period of time “reasonably balances the needs of carriers to earmark and set aside a number or group of numbers for a particular customer against the objective of improving the efficiency of numbering resource use.”⁷

Ad Hoc joins the Petitioners in requesting that the Commission reconsider this interest balancing and extend the period of time during which a number may be held in reserve. As the representative of some of the nation’s largest business users of telecommunications services, Ad Hoc agrees with the

⁴ “Reserved numbers” are defined as “numbers held by service providers at the request of specific end use customers for their future use.” *Order*, ¶ 22.

⁵ *Order*, ¶ 23.

⁶ *Order*, ¶ 23 (citing Number Resource Optimization Working Group Report on Telephone Number Reservations, Report to the North American Numbering Council, as modified by the North American Numbering Council (August 25, 1999)).

⁷ *Order*, ¶ 23.

Petitioners that a forty-five day limit will impede the ability of carriers to provide corporate customers with a number of services that are essential to fulfilling their business plans. In particular, as pointed out by the Petitioners, business users—including Ad Hoc's members—request that carriers reserve numbers for more than forty-five days under the following circumstances: (1) a new business or business unit needs to know its phone numbers(s) in order to print stationary, business cards, and advertising, and notify customers and suppliers of their telephone number(s); (2) a business that expects to expand wants to reserve additional telephone numbers in the same sequence; (3) a business Centrex user wants to reserve additional numbers for abbreviated dialing within its system; and (4) a business entering a new geographic market wants to reserve numbers in sufficient time so they can be published in Yellow Page directories, which are only printed once a year.⁸ The aforementioned scenarios are quite routine in the business world. Therefore, limiting the reservation period to forty-five days will have a significant and adverse impact on the telecommunications planning needs of the nation's businesses.

Business customers have paid a substantial economic price for the constant rollout of new NPAs because as telephone numbers change, businesses must notify their customers and suppliers, reprint stationary and advertising, and re-program their Centrex's and alarms. Therefore, Ad Hoc has

⁸ See Verizon Petition at 6; Petition of SBC Communications, Inc., ALTS, and NEXTLINK Communications Inc. at 2; Petition of SBC Communications, Inc. at 3; Petition for Immediate Partial Stay of USTA at 4-5; Petition for Clarification and/or Reconsideration of USTA at 7-8; BellSouth Petition at 1-4.

strongly supported, and continues to support, appropriate number conservation efforts.

The forty-five day limit on holding numbers in reserve, however, does little to conserve numbering resources. In its *Order* implementing this requirement, the Commission set forth no evidence indicating that business customers were likely to reserve numbers and then not use these numbers for business purposes.⁹ Further, when NANC addressed the issue, it concluded that a twelve month reserve period plus a six month extension would not put undue pressure on the NANP.¹⁰

Against this background, and based on the Petitions filed on this issue, the Commission should reconsider the costs and benefits of limiting to forty-five days the amount of time during which a number can be held in reserve. Specifically, the carriers and their business customers have put forth credible evidence that such a short reservation period will interfere with the telecommunications planning needs of the nation's business customers. Because there is little evidence that this forty-five day limit will have a substantially positive impact on number conservation, the Commission should stay Section 52.15(f)(1)(vi) of its Rules, and, on reconsideration, lengthen the period of time during which a telephone number can be held in reserve to an interval that is consistent with the needs of business customers. In this matter, Ad Hoc endorses the twelve month

⁹ *Order*, ¶ 23.

¹⁰ Number Resource Optimization Working Group Report on Telephone Number Reservations, Report to the North American Numbering Council, as modified by the North American Numbering Council (August 25, 1999).

reservation period with an additional six month extension period suggested by NANC.

III. Conclusion

The Commission should modify its Rules to allow a telephone number to be held in reserve for up to eighteen months.

Respectfully submitted,

Ad Hoc Telecommunications
Users Committee

By S. ROSEN

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July 24, 2000

Certificate of Service

I, Anthony J. Mangino, hereby certify that a true and correct copy of the preceding Comments in Partial Support of the ILEC Petitions for Stay and Reconsideration of the Ad Hoc Telecommunications Users Committee was served this July 24, 2000 via hand delivery and first class mail upon the following parties:

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